

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION

2006 SEP 29 A 10:16

JOWEL S. NUNN,

PLAINTIFF,

VS.

CIVIL ACTION NO. 1:06-cv-452-MEF-CSC

GENEVA COUNTY COMMISSION,
et al.,

DEFENDANTS.


PLAINTIFF'S MOTION FOR APPOINTMENT OF COUNSEL

Comes now the plaintiff by and through himself and pro se and move this honorable court in a motion for appointment of counsel pursuant to Federal Rules of Civil Procedure and as good cause the plaintiff shows the following in support of his request for counsel:

- 1) The plaintiff herein contends that appointment of counsel is appropriate in the case at bar because plaintiff's claims are factually and legally complex which has created exceptional circumstances warranting counsel.
- 2) The plaintiff herein contends that appointment of counsel is appropriate because, Jowel S. Nunn, plaintiff and pro se prisoner, has made claims that are not frivolous nor malicious, and because plaintiff has presented a colorable claim and is ill-equipped to represent himself.
- 3) The plaintiff herein contends that appointment of counsel is appropriate because: (a) The type and complexity of the case; (b) The plaintiff who is indigent litigant is not capable of adequately presenting his case; (c) The plaintiff as a indigent litigant is in no position to investigate his case adequately : and that the evidence will consist in large part of conflicting testimony, thus requiring skill in presentation and cross-examination.

Wherefore the premises considered the plaintiff pray this honorable court shall grant the relief requested in this his motion for appointment of counsel for the proper

administration of justice in the case at bar.



JOWEL S. NUNN

CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of the foregoing motion for appointment of counsel on the defendant by placing the same in the United States mail postage pre-paid and properly addressed to the following:

C. Richard Hill Jr.
WEBB AND ELEY
7475 Halcyon Pointe Drive (36117)
Post Office Box 240909 (36124)
Montgomery Alabama

Done this 27 day of Sept. 2006